

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Christopher David Bailey
Debtors

J.P. Morgan Mortgage Acquisition Corp.,
Movant,
v.

Christopher David Bailey,
Respondent/Debtors,
and
Jack N Zaharopoulos, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
1:24-bk-01674-HWV

**OBJECTION OF J.P. MORGAN MORTGAGE ACQUISITION CORP. TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

J.P. Morgan Mortgage Acquisition Corp., by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about July 8, 2024, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 18 North Franklin Street, Waynesboro, PA 17268.
3. On or about July 24, 2024, Movant filed a Proof of Claim citing arrears in the amount of \$57,421.61, and a total claim in the amount of \$125,520.12.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$56,740.53 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, J.P. Morgan Mortgage Acquisition Corp. respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: July 31, 2024

LLG File #:20-064775

By: /s/ Christopher A. DeNardo
Christopher A. DeNardo, Esquire
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ORDER

AND NOW, this _____ day of _____, 2024, upon
consideration of the Objection of J.P. Morgan Mortgage Acquisition Corp. to the confirmation of
Debtor's Chapter 13 Plan of Reorganization, it is hereby ORDERED that the Objection is
sustained, and confirmation of Debtor's Plan is denied.

BY THE COURT:

HONORABLE HENRY W. VAN ECK
UNITED STATES BANKRUPTCY JUDGE

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CERTIFICATE OF SERVICE

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of J.P. Morgan Mortgage Acquisition Corp.'s Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on July 31, 2024:

Michael A. Cibik, Esquire
Cibik Law, P.C.
1500 Walnut Street Suite 900
Philadelphia, PA 19102
Sent via electronic notification mail@cibiklaw.com

Jack N Zaharopoulos, Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Sent via electronic notification

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Christopher A. DeNardo

Christopher A. DeNardo
LOGS Legal Group LLP
985 Old Eagle School Road, Suite 514
Wayne, PA 19087
(610) 278-6800

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